GOLE & MOORE, P.S.G.

ATTORNEYS AT LAW

921 COLLEGE STREET - PHOENIX PLACE

POST OFFICE BOX 10240

BOWLING GREEN, KENTUCKY 42102-7240

JOHN DAVID GOLE
FRANK HAMPTON MOORE
DOV MOORE
JOHN DAVID GOLE, JR.
STEFAN RICHARD HUGHES
MATTHEW P. GOOK
JOSEPH RYAN LONEY
MIGA L. WOOD-OF GOUNSEL
FRANK HAMPTON MOORE, III

FRANK R. GOAD (1915-2005) September 16, 2013

TELEPHONE 270-782-6666 FACSIMILE 270-782-8666 www.coleandmoore.com

10, 2013

SEP 1 0 2013

PUTET MADE Columbia

Jeff Derouen, Executive Director Kentucky Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, KY 40602-0615

RE: Roy G. Cooksey, M.D. v. Bowling Green Municipal Utilities Board, et al. PSC Case No. 2013-00109

Dear Mr. Derouen:

Enclosed please find the original and ten copies of a Verified Response to Request for Information on behalf of Defendant, Warren County Water District, in the above-referenced matter. Please file these enclosures in this case. Thank you for your assistance in this regard. Please call with any questions.

Very truly yours,

COLE & MOORE, P.S.C.

Frank Hampton Moore, Jr.

Matthew P. Cook

Enclosures

xc: Alan H. Vilines, P.E. (w/encl.)

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

SEP 1 8 2013

PUBLIC SERVICE COMMISSION

IN THE MATTER OF

ROY G. COOKSEY, M.D.,

COMPLAINANT

V.

CASE NO. 2013-00109

WARREN COUNTY WATER DISTRICT,

DEFENDANT

<u>VERIFIED RESPONSE TO REQUEST FOR INFORMATION</u> <u>ON BEHALF OF DEFENDANT, WARREN COUNTY WATER DISTRICT</u>

Defendant, Warren County Water District, by counsel, for its response to the Complainant's request for information, states as follows:

The Complainant, Roy G. Cooksey, M.D. has requested that the Defendant, Warren County Water District, provide him with "all applications for Certificates of Public Convenience and Necessity filed on behalf of the Warren County Water District with respect to the Lovers Lane sewer line extension project, including all exhibits thereto."

In response, the Warren County Water District states that there are no such documents. The Lovers Lane sewer extension was funded with a state grant and there was no new debt associated with the project. It was an "extension in the ordinary course of business" pursuant to 807 KAR 5:001, Section 15(3); therefore, a certificate of public convenience and necessity was not required.

VERIFICATION

The undersigned, after first being duly sworn, states that he is the General Manager of the Warren County Water District, and hereby verifies that the information contained in this response are true and correct to the best of his knowledge and belief.

This 16 day of SEPTEMBER, 2013.

Alan H. Vilines, P.E. General Manager

COMMONWEALTH OF KENTUCKY

COUNTY OF WARREN

SUBSCRIBED AND SWORN TO before me, by ALAN H. VILINES, P.E., on this the day of Leptember, 2013.

) SS.

)

My Commission Expires: 2-1-16

for of Velices

COLE & MOORE, P.S.C.

921 College Street - Phoenix Place

P.O. Box 10240

Bowling Green, KY 42102-7240

Phone: (270) 782-6666 Fax: (270) 782-8666

Frank Hampton Moore, Jr.

Matthew P. Cook

Counsel for Warren County Water District

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing has this //day of September, 2013, forwarded by U.S. Mail to the following:

Jeff Derouen Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602-0615

Keith M. Carwell English, Lucas, Priest & Owsley 1101 College Street P.O. Box 770 Bowling Green, KY 42102-0770 Counsel for Roy G. Cooksey, M.D.

Frank Hampton Moore, Jr.

Matthew P. Cook

Counsel for Warren County Water District